

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
ROCK HILL DIVISION

FEDERAL TRADE COMMISSION,

Plaintiff,

v.

NATIONAL LANDMARK LOGISTICS LLC,
et al.,

Defendants

Civil Action No. 0:20-cv-02592-JMC

**JOINT NOTICE OF RESULTS OF
MEDIATION AND REQUEST TO
STAY CASE FOR 120 DAYS TO
CONSIDER SETTLEMENT
AGREEMENT AS TO THE
NATIONAL LANDMARK
DEFENDANTS**

Come now Plaintiff Federal Trade Commission (“FTC”) and the National Landmark Defendants, by and through their respective counsel, and hereby report the results of mediation, as requested by the Court in its February 19, 2021 Order to Conduct Mediation. (ECF No. 93.) The parties met in person on Friday July 16, 2021 and again telephonically on Thursday July 22, 2021 with Magistrate Judge Mary Gordon Baker. The parties are pleased to report that, with Judge Baker’s assistance, they have negotiated a final settlement in this matter.

The parties also agree, stipulate, and move the Court for an order staying all deadlines in this case for 120 days, including staying all deadlines set forth in the Conference and Scheduling Order (ECF No. 92). In support of this request, the parties state as follows.

1. As mentioned, counsel for the FTC and the National Landmark Defendants have negotiated a final settlement in this matter.
2. Although FTC counsel has authority to negotiate settlement agreements, under Section 4.14 of the FTC’s Rules of Practice, 16 C.F.R. § 4.14(c), only a majority vote by the several FTC Commissioners can approve any such agreement.
3. If the FTC approves the settlement, further litigation in this matter will not be necessary.

4. Because the FTC's review and approval process can take several weeks, the parties respectfully request that the Court stay the case for 120 days to allow adequate time for the FTC to review and approve the final settlement.
5. The requested stay would not apply to the Receiver's continued actions under, and implementation of, the Court's orders.

Wherefore, based on the foregoing, the FTC and the National Landmark Defendants respectfully request that this stipulation be granted and the entire case be stayed for 120 days. A proposed order has been filed herewith.

IT IS SO STIPULATED:

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*Attorneys for Plaintiff
FEDERAL TRADE COMMISSION*

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on July 23, 2021, a true and correct copy of (1) **JOINT NOTICE OF RESULTS OF MEDIATION AND REQUEST TO STAY CASE FOR 120 DAYS TO CONSIDER SETTLEMENT AGREEMENT AS TO THE NATIONAL LANDMARK DEFENDANTS** and (2) **[proposed] ORDER STAYING CASE FOR 120 DAYS TO CONSIDER SETTLEMENT AGREEMENT AS TO THE NATIONAL LANDMARK DEFENDANTS** were filed electronically with the United States District Court for the District of South Carolina using the CM/ECF system, which sent notification to all parties of interest participating in the CM/ECF system.

/s/Johanna C. Valenzuela
Attorney for Plaintiff Federal Trade Commission